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April 2, 2024

VIA ECF

Hon. Lee G. Dunst Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Agudelo et. al. v. Recovco Mortgage Management LLC et. al.

Case No. 22-cv-4004

Dear Magistrate Judge Dunst:

This law firm represents Plaintiffs in the above-captioned matter. We write, with the consent of Defendants Wright and Salzman,¹ to request a one-week extension of Plaintiffs' current April 5, 2024, deadline to file their Motion to Amend. Plaintiffs have been working diligently to prepare their Amended Complaint and accompanying motion, but coordinating among several different law firms to combine multiple class action lawsuits with various state claims necessitates this short extension.

The parties further agree that Defendant Wright will still have 14 days, and Defendant Salzman will have 30 days, from the filing of the newly amended Complaint to answer, file revised motions to dismiss, or ask the Court to consider their currently pending motions to have been submitted against the new Complaint.

Sincerely,
/s/ Bruce Menken
Bruce Menken
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¹ Defendants Strauss and Recovco still have not complied with the Court's order to appear through counsel by March 8, 2024, and continue to ignore Plaintiffs' notifications of developments in this lawsuit. Plaintiffs therefore are not able to secure their consent to this request.